



March 27, 2008

Harlan M. Lazarus
Lazarus & Lazarus, P.C.
250 Madison Avenue
8th Floor
New York, New York 10016

Re: Cyber Champion Int'l, Ltd. v. Carlos Falchi, Marcos Falchi and XYZ Cos.

Dear Mr. Lazarus:

Enclosed is Confidential sales information for the Chi by Falchi branded merchandise, which is responsive to your February 6, 2008 Subpoena in a Civil Case to HSN LP d/b/a Home Shopping Network. The cost for this second production of 12 pages is \$3.00. Please forward a check to me made payable to HSN LP. HSN LP's Federal Tax ID number is 59-3490596.

As for the remaining two categories of information: (1) payments made from HSN to Carlos or Marcos Falchi or vendors associated with the same and (2) communications between HSN and Carlos or Marcos Falchi, clearly you are seeking a large volume of potential documents for each of these categories of information. Please be advised that this information is NOT maintained by HSN LP d/b/a Home Shopping Network in the ordinary course of its business in the format you are seeking. Consequently, HSN would be forced to expend substantial man hours in an attempt to comply with your ponderous demands. Therefore, I am compelled to renew my request in the strongest possible terms that you narrow your demand for the production of documents.

As a direct result of the volume of documents and amount of time HSN has already expended in trying to reasonably comply with the subpoena, as well as your continued demands, we have retained local, New York counsel. Please direct all future correspondence to Ken Goldberg at Goldberg & Associates, 39 Broadway, New York, New York 10006 (212-968-2300) regarding your request for information pursuant to the subpoena.

Sincerely,

A handwritten signature in black ink, appearing to read "Shauna Burkes".

Shauna Burkes
Senior Counsel

Enclosure